

Remarks

Reconsideration of this Application is respectfully requested.

After entry of the above amendment, claims 1, 2, 4, 7-40, 42-43, 80-98, 100 and 101 are pending. Claims 80-98 have been withdrawn based on the Examiner's restriction of these claims. Claim 99 has been canceled without prejudice or disclaimer. New claim 101 has been added. No new matter has been added. Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

The Examiner has rejected claims 1, 2, 4, 7-9, 31-40, 42, 43 and 99 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,714,997 to Anderson in view of U.S. Patent No. 5,164,827 to Paff in view of U.S. Patent No. 7,046,812 to Kochanski *et al.* in view of Fergestad *et al.* (WO 01/10517 A1). The Examiner further rejected claims 10-16 under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of Paff in view of Kochanski *et al.* in view of Fergestad *et al.* and further in view of U.S. Patent No. 6,057,833 to Heidmann *et al.* Finally, the Examiner rejected claims 17-30 and 100 under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of Paff in view of Kochanski *et al.* in view of Fergestad *et al.* and further in view of U.S. Patent Pub. No. 2002/0118286 to Kannade *et al.* Applicants respectfully traverse.

In order to expedite prosecution, and without acquiescing to the propriety of the Examiner's rejection, Applicants have amended claim 1 recite "whereby said master camera is configurable to point at a target among a plurality of targets, wherein each of said plurality of targets includes an RF transmitter that transmits positional coordinates, wherein at least two of said plurality of targets transmit said positional coordinates over a

different carrier frequency . . . wherein said master monitoring unit is responsive to a plurality of function keys, each function key is associated with one of said plurality of targets, whereby activating a function key automatically controls the plurality of cameras to focus on said associated target." The art of record, even when one assumes, for present purposes, the propriety of combining those references in the manner proposed by the Examiner, does not appear to teach or suggest function keys associated with targets.

Further, the Examiner is respectfully reminded that the use of impermissible hindsight to pick and choose features from allegedly related references and systems to meet the above-noted distinguishing features using the claims as a blueprint or template, is not permitted under the prevailing patent laws. The Supreme Court also confirmed that, "[a] fact finder should be aware, of course, of the distinction caused by hindsight bias and must be cautious of arguments reliant upon ex post reasoning." *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1742 (2007). *See also Continental Can Company v. Monsanto Company*, 948 F.2d 1264, 1271, 20 USPQ2d 1746, 1751 (Fed. Cir. 1991) ("When prior art references require selective combination...there must be some reason for the combination other than the hindsight gleaned from the invention itself.").

Accordingly, Applicants respectfully request that the rejection be withdrawn and claims 1, 2, 4, 7-40, 42-43 and 100 be passed to allowance. Applicants further request that new claim 101 is also patentable over the art of record for at least the same reasons as independent claim 1 from which it depends and further in view of its respective features.

Conclusion

All of the stated grounds rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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